

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHARLES COPELAND	:	
807 Wynnewood Road	:	
Philadelphia, PA 19151	:	CIVIL ACTION
Plaintiff,	:	No.: _____
v.	:	
BETH DAVID REFORM CONGREGATION	:	
1130 Vaughan Lane	:	JURY TRIAL DEMANDED
Gladwyne, PA 19035	:	
Defendant.	:	

**CIVIL ACTION COMPLAINT**

Charles Copeland (*hereinafter* referred to as “Plaintiff,” unless indicated otherwise) by and through his undersigned counsel, hereby avers as follows:

**INTRODUCTION**

1. Plaintiff has initiated this action to redress violations by Beth David Reform Congregation of the American’s with Disabilities Act, as amended (“ADA” – 42. U.S.C. §§ 12101 *et seq.*), the Age Discrimination in Employment Act (“ADEA” – 29 U.S.C. §§ 621 *et seq.*), the Family and Medical Leave Act (“FMLA” - 29 U.S.C. §§ 2601 *et seq.*), the Pennsylvania Human Relations Act (“PHRA”)<sup>1</sup>, and Pennsylvania common law. As a direct consequence of Defendant’s unlawful actions, Plaintiff seeks damages as set forth herein.

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<sup>1</sup> Plaintiff’s claim under the PHRA is referenced herein for notice purposes. He is required to wait 1 full year before initiating a lawsuit from date of dual-filing with the EEOC. Plaintiff must however file his lawsuit in advance of same because of the date of issuance of his federal right-to-sue-letter under the ADA and ADEA. Plaintiff’s PHRA claims however will mirror identically his federal claims under the ADA and ADEA.

**JURISDICTION AND VENUE**

2. This Court has original subject matter jurisdiction over the instant action pursuant to 28 U.S.C. §§ 1331 and 1333(a)(4) because it arises under the laws of the United States and seeks redress for violations of federal laws.

3. This Court may properly assert personal jurisdiction over Defendant because its contacts with this state and this judicial district are sufficient for the exercise of jurisdiction over Defendant to comply with traditional notions of fair play and substantial justice, satisfying the standard set forth by the United States Supreme Court in *International Shoe Co. v. Washington*, 326 U.S. 310 (1945) and its progeny.

4. Pursuant to 28 U.S.C. § 1333(b)(1) and (b)(2), venue is properly laid in this district because Defendant is deemed to reside where it is subjected to personal jurisdiction, rendering Defendant a resident of the Eastern District of Pennsylvania.

5. Plaintiff is proceeding herein (in part) under the ADA and ADEA after properly exhausting all administrative remedies with respect to such claims by timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) and by filing the instant lawsuit within ninety (“90”) days of receiving a notice of dismissal and/or right to sue letter from the EEOC.

**PARTIES**

6. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

7. Plaintiff is an adult individual with an address set forth in the caption.

8. Defendant Beth David Reform Congregation (*hereinafter* “Defendant”) is a Non-Profit (non-stock) synagogue, located at the above-captioned address engaged in the religious practice of Judaism.

9. At all relevant times herein, Defendant acted by and through its agents, servants and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for the Defendant.

### **FACTUAL BACKGROUND**

10. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

11. Plaintiff is a 67-year-old male.

12. Plaintiff was hired by Defendant in or about August of 1989 and remained working for Defendant for approximately 27 years before being unlawfully terminated in or about April of 2017 (discussed further *infra*).

13. When Plaintiff was initially hired by Defendant in or about August of 1989, he primarily performed labor work in the maintenance department.

14. Throughout the years, Plaintiff proved to Defendant that he was able to perform his job well and as a result, in or about mid-2008, Plaintiff was promoted to full-time “Head of Maintenance”, a position which was later renamed “Facilities’ Manager”.

15. Towards the end of his employment with Defendant, Plaintiff began being subjected to hostility and animosity because of his advanced age by Defendant’s management.

16. For example, unlike his younger co-workers, Plaintiff was belittled, issued pretextual discipline, perceived to be too ill to work (in January of 2016) and had his concerns (including his concerns of harassment) ignored or down-played.

17. In the months preceding Plaintiff's termination from Defendant (discussed further *infra*), Plaintiff was suffering from disabilities, including but not limited to a condition related to his shoulder.

18. For example, on or about March 6, 2017, while performing work for Defendant, Plaintiff suffered an injury to his shoulder, which was reported to Defendant's management as work-related injury and for which he later filed a worker's compensation claim.

19. As a result of Plaintiff's disabilities (discussed *supra*), Plaintiff suffered from neck pain, shoulder pain and joint pain and (at times) was limited in his ability to lift, push, pull, and work.

20. Despite his aforementioned health conditions and limitations, Plaintiff was still able to perform the duties of his job well with Defendant; however, Plaintiff did require reasonable medical accommodations at times (discussed further *infra*).

21. On or about March 7, 2017, Plaintiff apprised Jill Cooper (Director of Operations, *hereinafter* "Cooper") of his need for medical accommodations due to his aforesaid health conditions, which included intermittent time off to attend physical therapy (FMLA-qualifying leave).

22. Plaintiff attended physical therapy approximately 2-3 times per week from in or about mid-March of 2017 through on or about April 28, 2017, the date of his termination (discussed further *infra*).

23. Plaintiff's aforesaid physical therapy was comprised of 2-3-hour sessions, which required him to miss some time from work.

24. After Plaintiff apprised Defendant's management of his aforesaid health conditions, need for accommodations and need for workers' compensation benefits, Plaintiff was

subjected to increased hostility and animosity, including but not limited to treating him in a rude and demeaning manner, overly scrutinizing his performance, and making degrading comments to him (such as calling him “the most disgusting person” she [Cooper] ever met).

25. Plaintiff expressed concerns to Cooper regarding the unfair discriminatory treatment that he was being subjected to; however, his concerns were never properly addressed or resolved in any meaningful way.

26. On or about April 26, 2017, Plaintiff completed his physical therapy rehabilitation related to his aforesaid shoulder condition.

27. On or about April 28, 2017, Plaintiff attended a meeting with Ray Reed (President, *hereinafter* “Reed”) and Neal Sudkani (Vice President, *hereinafter* “Sudkani”).

28. During his aforesaid April 28, 2017 meeting with Defendant’s management, Plaintiff was informed that his position of Facilities’ Manager was being eliminated due to budget reasons. Plaintiff was further told, after giving over 27 years of service to Defendant, that he had approximately two (2) hours to clean out his office.

29. Immediately following Plaintiff’s aforesaid termination, Defendant offered Plaintiff an unsolicited severance agreement asking him to waive all legal claims against Defendant in exchange for monetary consideration.<sup>2</sup>

30. Plaintiff did not sign the aforementioned severance agreement.

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<sup>2</sup> See e.g. *Staffieri v. Northwestern Human Servs.*, 2013 U.S. Dist. LEXIS 72115 at \*\*14-15 (E.D. Pa. May 22, 2013)(an employer who offered severance when policies did not require upon condition of waiving FMLA claim supported finding of pretext in FMLA claim among other facts); See also *Bartlett v. NIBCO Inc.*, 2011 U.S. Dist. LEXIS 28072 (N.D. Ind. 2011)(“Severance pay packages contingent upon a release of claims which are offered contemporaneously with the notice of termination are not covered by [Rule 408]”, and the motive in offering same is admissible evidence in a retaliation claim and is admissible at trial in this case); *Karl v. City of Mountlake Terrace*, 2011 U.S. Dist. LEXIS 59085 (W.D. Wash. 2011)(severance agreements are admissible in retaliation claims when made contemporaneous to termination, as they are not governed by FRE 408); *EEOC v. Republic Servs., Inc.*, 640 F. Supp. 2d 1267 (D. Nev. 2009)(denying summary judgment and considering as evidence in wrongful termination case that a company would offer severance when an employee is supposedly terminated in a manner that doesn’t warrant severance per an explicit company policy).

31. Plaintiff believes that his termination (labeled as a “job elimination”) is completely pretextual as there were two other younger individuals (approximately in their early 40s) who worked with Plaintiff in the maintenance division of Defendant. Neither of these individual’s positions were eliminated and Plaintiff had more seniority and experience than either of these individuals.

32. Furthermore, upon information and belief, Plaintiff’s position as “Facilities’ Manager” was replaced by one of the aforesaid younger individuals, Antonio Artis (approximately early 40s), who was Defendant’s former “Night Manager” and had only been employed with Defendant for approximately four (4) years at the time of Plaintiff’s termination.

33. Plaintiff therefore believes and avers that his termination was completely pretextual and that he was really terminated in violation of the ADA, ADEA, FMLA, and common law.

**COUNT I**

**Violation of the Americans with Disabilities Act, as amended (“ADA”)**

**([1] Actual/Perceived/Record of Disability Discrimination; [2] Hostile Work Environment; [3] Retaliation)**

34. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

35. Towards the end of his employment, Plaintiff suffered from health conditions (discussed *supra*) which resulted in neck, shoulder, and joint pain, which at times, affected his ability to perform some daily life activities, including but not limited to lifting, pushing, pulling, and working.

36. Despite Plaintiff’s aforementioned health conditions and limitations, he was still able to perform the duties of his job well with Defendant; however, Plaintiff did require reasonable medical accommodations at times.

37. Plaintiff requested reasonable medical accommodations from Defendant, consisting of intermittent time off from work and/or of flexible schedule so he could care for and treat for his aforesaid health conditions (including attending physical therapy).

38. In response to Plaintiff's health conditions and need for reasonable accommodations, Plaintiff was subjected to increased hostility and animosity by Defendant's management.

39. Plaintiff expressed concerns to Defendant's management regarding the unfair treatment he was being subjected to; however, his concerns were never properly addressed or resolved in any meaningful way.

40. Plaintiff was terminated from Defendant on or about April 28, 2017, shortly after taking intermittent time off due to his aforesaid health conditions and in close temporal proximity to his complaints of discrimination/retaliation to Defendant's management.

41. Therefore, Plaintiff believes and avers he was terminated from Defendant in violation of the ADA because of: (1) his known and/or perceived health problems; (2) his record of impairment; (3) his complaints of discrimination/retaliation, and/or (4) his requested accommodations.

42. These actions as aforesaid constitute unlawful discrimination, hostile work environment and retaliation under the ADA.

**COUNT II**  
**Violations of the Age Discrimination in Employment Act ("ADEA")**  
**(Age Discrimination - Hostile Work Environment & Wrongful Termination)**

43. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

44. Plaintiff was subjected to a hostile work environment towards the end of his employment due to his advanced age through disparate treatment, pretextual admonishment, and demeaning and/or discriminatory treatment towards him.

45. Plaintiff was terminated from his employment with Defendant because of his advanced age and replaced by a significantly younger individual with less experience and less seniority.

46. These actions as aforesaid constitute unlawful discrimination under the ADEA.

**COUNT III**  
**Common-Law Wrongful Discharge**  
**(Public Policy Violation)**

47. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

48. Upon information and belief, Plaintiff was terminated in substantial part for making a claim for workers' compensation benefits and/or seeking workers' compensation benefits and/or for his work-related injuries (as discussed *supra*).

49. It is against Pennsylvania's public policy for an employee to be terminated for making a workers' compensation claim and/or seeking workers' compensation benefits. These actions as aforesaid constitute wrongful termination in Pennsylvania. *See Shick v. Shirey*, 552 Pa. 590, 716 A.2d 1231 (1997); *Rothrock v. Rothrock Motor Sales, Inc.*, 584 Pa. 297, 883 A.2d 511, 516 (2005).

50. The mere temporal proximity between when Plaintiff sought workers' compensation benefits and/or filed a workers' compensation claim and his termination as well as the hostility that he faced following his workers' compensation injury creates an inference that his termination was in retaliation for making such a claim.

51. These actions as aforesaid constitute wrongful termination in Pennsylvania.

**COUNT IV**  
**Violations of the Family and Medical Leave Act ("FMLA")**  
**(Retaliation & Interference)**

52. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

53. Plaintiff was an eligible employee under the definitional terms of the FMLA, 29 U.S.C. § 2611(a)(i)(ii).

54. Plaintiff requested leave from Defendant, his employer, with whom he had been employed for at least twelve months pursuant to the requirements of 29 U.S.C.A § 2611(2)(i).

55. Plaintiff had at least 1,250 hours of service with Defendant during his last full year of employment.

56. Upon information and belief, Defendant is engaged in an industry affecting commerce and employs fifty (50) or more employees for each working day during each of the twenty (20) or more calendar work weeks in the current or proceeding calendar year, pursuant to 29 U.S.C.A § 2611(4)(A)(i).

57. Plaintiff was entitled to receive leave pursuant to 29 U.S.C.A § 2612 (a)(1) for a total of twelve (12) work weeks of leave on a block or intermittent basis.

58. Defendant committed interference and retaliation violations of the FMLA by: (1) terminating Plaintiff for requesting and/or utilizing FMLA-qualifying leave and (2) terminating Plaintiff to prevent him from taking further FMLA-qualifying leave.

59. These actions as aforesaid constitute violations of the FMLA.

**WHEREFORE**, Plaintiff prays that this Court enter an Order providing that:

- A. Defendant is to promulgate and adhere to a policy prohibiting discrimination in the future against any employee(s);
- B. Defendant is to compensate Plaintiff, reimburse Plaintiff, and make Plaintiff whole for any and all pay and benefits Plaintiff would have received had it not been for Defendant's illegal actions, including but not limited to back pay, front pay, salary, pay increases, bonuses, insurance, benefits, training, promotions, reinstatement and seniority;
- C. Plaintiff is to be awarded punitive and/or liquidated damages, as permitted by applicable law, in an amount believed by the Court or trier of fact to be appropriate to punish Defendant for their willful, deliberate, malicious and outrageous conduct and to deter Defendant or other employers from engaging in such misconduct in the future;
- D. Plaintiff is to be accorded other equitable and legal relief as the Court deems just, proper, and appropriate (including but not limited to damages for emotional distress, pain, suffering, and humiliation); and
- E. Plaintiff is to be awarded the costs and expenses of this action and reasonable attorney's fees as provided by applicable federal and state law.

Respectfully submitted,

**KARPF, KARPE & CERUTTI, P.C.**

By:

  
Ari R. Karpf, Esq.

3331 Street Rd.

Two Greenwood Square, Suite 128

Bensalem, PA 19020

(215) 620-0801

Date: May 30, 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Charles Copeland

CIVIL ACTION

v.

Beth David Reform Congregation

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

(a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )

(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )

(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )

(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )

(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )

(f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

5/31/2018		Plaintiff
Date	Attorney-at-law	Attorney for
(215) 639-0801	(215) 639-4970	akarpf@karpf-law.com
Telephone	FAX Number	E-Mail Address

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 807 Wynnewood Road, Philadelphia, PA 19151

Address of Defendant: 1130 Vaughan Lane, Gladwyne, PA 19035

Place of Accident, Incident or Transaction: Defendant's place of business

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes  No

Does this case involve multidistrict litigation possibilities?

Yes  No

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes  No
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes  No
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes  No
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes  No

CIVIL: (Place  in ONE CATEGORY ONLY)

A. Federal Question Cases:

1.  Indemnity Contract, Marine Contract, and All Other Contracts
2.  FELA
3.  Jones Act-Personal Injury
4.  Antitrust
5.  Patent
6.  Labor-Management Relations
7.  Civil Rights
8.  Habeas Corpus
9.  Securities Act(s) Cases
10.  Social Security Review Cases
11.  All other Federal Question Cases

(Please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1.  Insurance Contract and Other Contracts
2.  Airplane Personal Injury
3.  Assault, Defamation
4.  Marine Personal Injury
5.  Motor Vehicle Personal Injury
6.  Other Personal Injury (Please specify)
7.  Products Liability
8.  Products Liability — Asbestos
9.  All other Diversity Cases

(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Ari R. Karpf,



counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 5/31/2018

Attorney-at-Law

ARK2484

Attorney I.D.# 91538

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.



DATE: 5/31/2018

Attorney-at-Law

ARK2484

Attorney I.D.# 91538

CIV. 609 (5/2012)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

COPELAND, CHARLES

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Karpf, Karpf & Cerutti, P.C.; 3331 Street Road, Two Greenwood Square, Suite 128, Bensalem, PA 19020; (215) 639-0801; akarpf@karpf-law.com

## DEFENDANTS

BETH DAVID REFORM CONGREGATION

County of Residence of First Listed Defendant Montgomery  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff  3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant  4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

110 Insurance  
 120 Marine  
 130 Miller Act  
 140 Negotiable Instrument  
 150 Recovery of Overpayment & Enforcement of Judgment  
 151 Medicare Act  
 152 Recovery of Defaulted Student Loans (Excludes Veterans)  
 153 Recovery of Overpayment of Veteran's Benefits  
 160 Stockholders' Suits  
 190 Other Contract  
 195 Contract Product Liability  
 196 Franchise

**PERSONAL INJURY**  
 310 Airplane  
 315 Airplane Product Liability  
 320 Assault, Libel & Slander  
 330 Federal Employers' Liability  
 340 Marine  
 345 Marine Product Liability  
 350 Motor Vehicle  
 355 Motor Vehicle Product Liability  
 360 Other Personal Injury  
 362 Personal Injury - Medical Malpractice

**PERSONAL PROPERTY**  
 370 Other Fraud  
 371 Truth in Lending  
 380 Other Personal Property Damage  
 385 Property Damage Product Liability

625 Drug Related Seizure of Property  
21 USC 881  
 690 Other

422 Appeal 28 USC 158  
 423 Withdrawal 28 USC 157

375 False Claims Act  
 376 Qui Tam (31 USC 3729(a))  
 400 State Reapportionment  
 410 Antitrust  
 430 Banks and Banking  
 450 Commerce  
 460 Deportation  
 470 Racketeer Influenced and Corrupt Organizations  
 480 Consumer Credit  
 490 Cable/Sat TV

820 Copyrights  
 830 Patent  
 835 Patent - Abbreviated New Drug Application  
 840 Trademark

710 Fair Labor Standards Act  
 720 Labor/Management Relations  
 740 Railway Labor Act  
 751 Family and Medical Leave Act  
 790 Other Labor Litigation

861 HIA (1395ff)  
 862 Black Lung (923)  
 863 DIWC/DIWW (405(g))  
 864 SSID Title XVI  
 865 RSI (405(g))

791 Employee Retirement Income Security Act

870 Taxes (U.S. Plaintiff or Defendant)  
 871 IRS—Third Party 26 USC 7609

462 Naturalization Application  
 465 Other Immigration Actions

210 Land Condemnation  
 220 Foreclosure  
 230 Rent Lease & Ejectment  
 240 Torts to Land  
 245 Tort Product Liability  
 290 All Other Real Property

440 Other Civil Rights  
 441 Voting  
 442 Employment  
 443 Housing/ Accommodations  
 445 Amer. w/Disabilities - Employment  
 446 Amer. w/Disabilities - Other  
 448 Education

**Habeas Corpus:**  
 463 Alien Detainee  
 510 Motions to Vacate Sentence  
 530 General  
 535 Death Penalty  
**Other:**  
 540 Mandamus & Other  
 550 Civil Rights  
 555 Prison Condition  
 560 Civil Detainee - Conditions of Confinement

## V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding  2 Removed from State Court  3 Remanded from Appellate Court  4 Reinstated or Reopened  5 Transferred from Another District (specify)  6 Multidistrict Litigation - Transfer  8 Multidistrict Litigation - Direct File

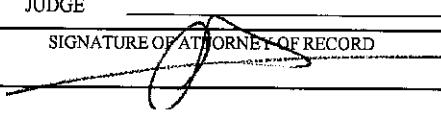
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**ADA (42USC12101); ADEA (29USC621); FMLA (29USC2601)**

Brief description of cause:  
**Violations of the ADA, ADEA, FMLA and the PHRA.**

**VI. CAUSE OF ACTION**  CHECK IF THIS IS A CLASS ACTION  DEMAND \$  CHECK YES only if demanded in complaint:  
**COMPLAINT:** UNDER RULE 23, F.R.Cv.P.  JURY DEMAND:  Yes  No

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION  DEMAND \$  CHECK YES only if demanded in complaint:  
**COMPLAINT:** UNDER RULE 23, F.R.Cv.P.  JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*  JUDGE  DOCKET NUMBER

DATE 5/31/2018 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT #  AMOUNT  APPLYING IFP  JUDGE  MAG. JUDGE

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